

REMARKS

Upon entry of the present amendment claims 1-3, 5-19, and 25-28 are pending in the application. Claims 20-24 were previously canceled.

Claims 1, 3, 14, and 19 have been amended in accordance with the requirements of U.S. patent practice. Claim 4 has been canceled. No new claims have been added. Claim 3 has been amended to correct a typographical error. Support for the amendments claims 1, 14, and 19 may be found at least in the following: claim 4 as originally filed, the Specification at page 9, line 26 through page 10, line 12, and the working example on page 37. Applicants respectfully request entry of the preliminary amendment.

Amendments to, cancellation of, and additions to, the claims, as set forth above, are made in order to streamline prosecution in this case by limiting examination and argument to certain claimed embodiments that presently are considered to be of immediate commercial significance. Amendment or cancellation of the claims is not in any manner intended to, and should not be construed to, waive Applicants' right in the future to seek such unamended or cancelled subject matter, or similar matter (whether in equivalent, broader, or narrower form) in the present application, and any continuation, divisional, continuation-in-part, RCE, or any other application claiming priority to or through the present application, nor in any manner to indicate an intention, expressed or implied, to surrender any equivalent to the claims as pending after such amendments or cancellations.

1. **Rejection of claims 1-3, 5-19, 25-26, and 28 under 35 U.S.C. §102(b) as anticipated by Hovestadt et al., U.S. 6,335,381, hereafter "Hovestadt" or "381".**

Applicants greatly appreciate the detailed basis of rejection but must respectfully disagree in regards to the inventions of amended independent claims 1, 14, and 19.

Hovestadt merely discloses a crosslinking mixture comprising a single photoinitiator in Example 3. In contrast, Applicants' inventions of claims 1, 14, and 19 require a mixture of particular photoinitiators, i.e., the mixture of at least three initiators is selected from the group consisting of a combination of unimolecular (type I) and bimolecular (type II) photoinitiators.

The use of a combination of three particular photoinitiators is not disclosed in Hovestadt. To anticipate a claim, a single source must contain all of the elements of the claim. *Hybritech Inc. v. Monoclonal Antibodies, Inc.*, 231 U.S.P.Q. 81, 90 (Fed. Cir. 1986). Missing elements may not be supplied by the knowledge of one skilled in the art or the disclosure of another reference. *Structural Rubber Prods. Co. v. Park Rubber Co.*, 223 U.S.P.Q. 1264, 1271 (Fed. Cir. 1984).

Accordingly, Applicants respectfully submit that Hovestadt cannot anticipate the inventions of amended independent claims 1, 14, and 19, nor those of any claims dependent therefrom.

Reconsideration and removal of the anticipation rejection of claims 1-3, 5-19, 25-26, and 28 is respectfully requested in view of the foregoing amendments and remarks.

2. **Rejection of claims 1-3, 5-19, 25-28 under 35 U.S.C. §103(a) as obvious over Hovestadt et al., U.S. 6,335,381, hereafter “Hovestadt” or “381” in view of Baumgart et al., U.S. 7,064,165, hereafter “Baumgart” or “165”.**

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP 2143.

Applicants greatly appreciate the detailed basis of rejection. However, Applicants must respectfully submit that this standard has not been met with the instant combination of references. The foregoing comments of Section 1 above are hereby incorporated by reference.

In particular, it is submitted that Baumgart fails to rectify the above noted deficiencies of Hovestadt. As noted above, Applicants' inventions of claims 1, 14, and 19 require a mixture of particular photoinitiators, i.e., the mixture of at least three initiators is selected from the group consisting of a combination of unimolecular (type I) and bimolecular (type II) photoinitiators. The use of a combination of three particular photoinitiators is not disclosed in Hovestadt.

Baumgart appears to be relied upon by the PTO only for its disclosure of effect paints or multicoats and thus does not rectify the above noted deficiencies of Hovestadt. Taken as a whole, it is respectfully submitted that the cited combination fails to provide the requisite prima facie case of obviousness.

Reconsideration and removal of the obviousness rejection of claims 1-3, 5-19, 25-28 is respectfully requested in view of the foregoing remarks.

CONCLUSION

Applicant(s) respectfully submit that the Application and pending claims are patentable in view of the foregoing amendments and/or remarks. A Notice of Allowance is respectfully requested. As always, the Examiner is encouraged to contact the Undersigned by telephone if direct conversation would be helpful.

Respectfully Submitted,

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